

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

United States of America)

v.)

Joshua Ketcherside,)

Cory Raley, and)

Jamie Carlos-Eduardo, Jr.,)

Case No. M-21-692 STE)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 20, 2021 through November 10, 2021 in the county of Cleveland & Oklahoma in the
Western District of Oklahoma, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. § 846

Conspiracy to possess with the intent to distribute and to distribute
 50 grams or more of a mixture and substance containing a
 detectable amount of methamphetamine, its salts, osomers, or salts
 of its isomers, a Schedule II controlled substance

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Matthew Wyckoff, Drug Enforcement Administration (DEA),
 which is incorporated and made a part hereof by reference.

☒ Continued on the attached sheet.

Complainant's signature

Special Agent Matthew Wyckoff (DEA)

Printed name and title

Sworn to before me and signed in my presence.

Date:

12/10/21City and state: Oklahoma City, Oklahoma

Judge's signature

SHON T. ERWIN, U.S. Magistrate Judge

Printed name and title

**WESTERN DISTRICT OF OKLAHOMA
OKLAHOMA CITY, OKLAHOMA**

STATE OF OKLAHOMA)

COUNTY OF OKLAHOMA)

A F F I D A V I T

I, Matthew Wyckoff, being duly sworn, depose and state the following:

INTRODUCTION

1. I am a Special Agent (SA) of the Drug Enforcement Administration (DEA), United States Department of Justice since August 2010. As a SA, I am an investigative law enforcement officer of the United States of America within the meaning of 21 U.S.C. § 878, that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in 21 U.S.C. § 878. I have specific training and experience in numerous methods of investigation, including, but not limited to, electronic and visual surveillance, general questioning of witnesses, the use of search warrants, the use of confidential sources/informants, the use of pen registers, and the use of undercover agents. Based on my training and experience relating to the investigation of drug traffickers, and based upon interviews I have conducted with other officers, defendants, informants, and other witnesses and participants in drug trafficking activity, I am familiar with the ways that drug traffickers

conduct their business. My familiarity includes the various means and methods by which drug traffickers import and distribute drugs, their use of cellular telephones, their use of vehicles, and their use of numerical codes and code words to conduct drug transactions. I am also familiar with the ways that drug traffickers conceal, convert, transmit and transport their drug proceeds.

2. I am familiar with the facts and circumstances of this investigation because of my personal participation in the investigation referred to in this affidavit and information summarized in reports I have reviewed. I have compiled information derived from numerous discussions with experienced law enforcement officers, including SAs of the DEA and other State and Local law enforcement officers.

3. Based upon the following facts, I believe that probable cause exists to show that **Joshua KETCHERSIDE (DOB 06-27-1986), Cory RALEY (DOB 11-13-1990), Jaime CARLOS-EDUARDO, Jr. (DOB 01-21-1994)** and others, conspired to possess with intent to distribute and distribute fifty (50) grams of more of a mixture or substance containing a detectable amount of methamphetamine, in violation of 21 U.S.C. § 846. Since this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every known fact regarding the instant investigation.

PROBABLE CAUSE

4. In September 2020, agents/officers obtained information that Joshua KETCHERSIDE was distributing methamphetamine in the Oklahoma City area. Two different cooperating sources identified KETCHERSIDE as an inmate in the Oklahoma Department of Corrections who went by the moniker “CHAOS.”

5. October 20, 2021, agents/officers coordinated a controlled purchase of 447.6 gross grams of suspected methamphetamine, to include packaging. A Payne County Confidential Source (CS) called “CHAOS” at 918-928-5073 to arrange the transaction. “CHAOS” was currently incarcerated with the Oklahoma Department of Corrections. “CHAOS” agreed to sell the CS 1 pound of methamphetamine for \$3,500. “CHAOS” directed the CS to a gas station in Moore, Oklahoma to meet the individual bringing the methamphetamine. When the CS arrived, Jaime CARLOS-EDUARDO¹ provided the CS with 447.6 gross grams of methamphetamine for \$3,500. The substance field tested positive for methamphetamine.

6. On October 26, 2021, Payne County Sheriff’s Office obtained a search warrant for TextNow for phone number 918-928-5073. The information obtained from TextNow included media files from 10/25/2019 to

¹ A subsequent traffic stop where CARLOS-EDUARDO identified himself confirmed that he was in fact the individual who delivered the methamphetamine on October 20, 2021.

10/25/2021. The media files included multiple pictures of Joshua KETCHERSIDE.

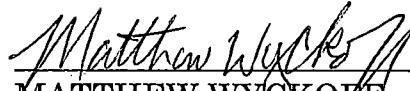
7. November 10, 2021, agents/officers coordinated a controlled purchase of 456.2 gross grams of suspected methamphetamine, to include packaging. A Payne County CS called “CHAOS” at 918-928-5073 to arrange the transaction. During the phone call, “CHAOS” said he was currently in prison. “CHAOS” also said he supplied drugs to “Morgan,” who was his ex-girlfriend. Through the course of this investigation, Morgan GRACE was identified as the girlfriend of KETCHERSIDE at one time. KETCHERSIDE agreed to sell the CS one pound of methamphetamine for \$4,000. KETCHERSIDE told the CS that “Cory” worked for him, and KETCHERSIDE directed the CS to a hotel parking lot in Oklahoma City, Oklahoma, to meet “Cory” to acquire the methamphetamine. When the CS arrived at the hotel parking lot, Cory RALEY² provided the CS with 456.2 gross grams of methamphetamine for \$4,000. The substance field tested positive for methamphetamine.

CONCLUSION

8. Based on these facts, I believe that probable cause exists to show that **Joshua KETCHERSIDE, Cory RALEY, Jaime CARLOS-**

² The CS, who had prior dealings with Cory RALEY, confirmed that the “Cory” who delivered him the methamphetamine on November 10, 2021 was in fact Cory RALEY.

EDUARDO, Jr. and others conspired to possess with intent to distribute and distribute fifty (50) grams or more of a mixture or substance containing a detectable amount of methamphetamine, in violation of 21 U.S.C. § 846.



MATTHEW WYCKOFF

Special Agent

Drug Enforcement Administration

SWORN AND SUBSCRIBED to before me on this 10th day of December, 2021.



SHON T. ERWIN

United States Magistrate Judge